

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

Reed Brodsky
Direct: +1 212.351.5334
Fax: +1 212.351.6235
RBrodsky@gibsondunn.com

March 13, 2017

VIA ECF

The Honorable Kiyo Matsumoto
United States District Court Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Shkreli, 15 Cr. 637 (KAM)

Dear Judge Matsumoto:

We respectfully write on behalf of Evan Greebel to continue the deadline for any other substantive non-*in limine* motions from this Friday, March 17 to Friday, April 7, 2017. We consent to providing whatever time the government needs to respond to such motions. The government informed us that it takes no position on our request, and counsel for Martin Shkreli informed us that they consent to our request.

We intend to submit a motion to compel Retrophin, Inc., to produce documents by the current deadline of March 17. However, we are seeking additional time for other potential motions for the following reasons:

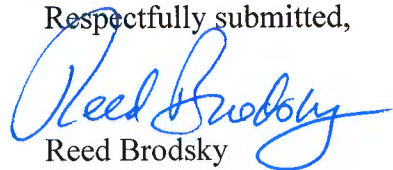
- 1) We are weighing whether to file certain motions and we need additional time to decide whether to file, and then to meet and confer with the government to determine whether it is necessary to file them;
- 2) We are still reviewing approximately 157,000 pages of documents from Katten Muchin Rosenman LLP, including the MSMB documents to which Mr. Shkreli waived privileges recently, and we wish to complete our review of those documents before making any additional substantive, non-*in limine* motions;
- 3) We are weighing the impact of Mr. Shkreli's decision on or about February 28, 2017 to waive privileges to the MSMB documents on bringing any motions;
- 4) An additional 3 weeks will not impact the current Scheduling Order deadlines in April, May, and June. In addition, it will not impact the trial date of June 26, 2017 should the Court deny the motions for severance (which we respectfully ask the Court to grant).

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For the foregoing reasons, Mr. Greebel respectfully requests that the Court grant his request to continue the deadline for any other substantive non-*in limine* motions to April 7. Attached please find a proposed order (Exhibit A) for Your Honor's consideration.

Respectfully submitted,


Reed Brodsky

cc: All counsel (via ECF)